

BEFORE THE
POSTAL REGULATORY COMMISSION

Periodic Reporting
(Proposal Thirteen)

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Docket No. RM2015-7

**MOTION OF UNITED PARCEL SERVICE, INC. FOR LEAVE TO
FILE REPLY TO UNITED STATES POSTAL SERVICE
OPPOSITION TO UPS MOTION REQUESTING ISSUANCE OF
AN INFORMATION REQUEST RELATED TO
PROPOSAL THIRTEEN**

(April 2, 2015)

United Parcel Service, Inc. (UPS) respectfully submits this motion for leave to file a reply to the Answer of the United States Postal Service in Opposition to UPS Motion for Issuance of an Information Request, which the Postal Service filed on March 30, 2015. Although the Commission's rules do not authorize a reply to a response as a matter of right, the Commission may accept such a pleading as a matter of discretion. 39 C.F.R. § 3001.21(b).

Several of the Postal Service's proffered reasons for opposing UPS's Motion appear to misunderstand the reasons why UPS has asked the Commission to make the information request. UPS thus requests an opportunity to clarify the reasons for the request and to briefly respond to the Postal Service's arguments, all of which are either meritless or misunderstand UPS's alternate model and its request for further information.

For these reasons, good cause exists for allowing UPS to file a reply.

Respectfully submitted,

UNITED PARCEL SERVICE, INC.,

By: /s/ Steig D. Olson

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